

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In the Matter of the Complaint)	CIVIL ACTION NO. 13-11909-JLT
)	
Of)	
)	
REINAUER TRANSPORTATION COMPANIES,)	
LLC as Owner of the Vessels CB 120 and DB112)	
for Exoneration from or Limitation of Liability)	

JOINT STATEMENT OF THE PARTIES FOR INITIAL SCHEDULING CONFERENCE

In accordance with the court's Notice of Scheduling Conference dated December 12, 2013 and Local Rule 16.1(D), the parties hereby submit their Joint Statement for the initial scheduling conference to be conducted at 11:00 a.m. on January 29, 2014.

I. Proposed Pretrial Schedule, Including Discovery Plan

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|--|--------------------|
| • Service of written discovery requests on or before | April 15, 2014 |
| • Non-expert depositions completed on or before | May 15, 2014 |
| • Amendments to the pleadings on or before | June 30, 2014 |
| • Plaintiff's Rule 26(a)(2) expert disclosures on/before | July 15, 2014 |
| • Defendant's Rule 26(a)(2) expert disclosures on/before | August 15, 2014 |
| • Experts' depositions completed on or before | September 30, 2014 |
| • Dispositive motions to be filed on or before | October 15, 2014 |
| and oppositions to be filed on or before | November 15, 2014 |
| • Rule 26(a)(3) pretrial disclosures on or before | December 15, 2014 |
| • Final pretrial conference on or before | December 30, 2014 |

II. Trial by Magistrate Judge

At present, the parties do not consent to trial by a magistrate judge.

III. Local Rule 16 (D)(3) Certification

The undersigned Plaintiff's counsel and Defendant's counsel certify that they have conferred with their respective clients pursuant to Local rule 16.1(d)(3) concerning costs and resolution of the litigation.

WHEREFORE, the parties pray that this Honorable Court approve the discovery and above schedule.

For the Plaintiff,
Bonita Feeney as Personal Representative
of the Estate of David Feeney,
By her attorney,

For the Defendants,
Reinauer Transportation Companies, LLC
and Reinauer Transportation Companies,
L.P.
By their attorney,

/s/ Brian Keane
Brian Keane, B.B.O. # 656717
THE KAPLAN/BOND GROUP
88 Black Falcon Avenue, Suite 301
Boston, MA 02210
(617) 261-0080
bkeane@kaplanbond.com

/s/ Gino A. Zonghetti
Gino Zonghetti, BBO #663120
Kaufman Dolowich & Voluck LLP
Court Plaza South
21 Main Street, Suite 251
Hackensack, NJ 07601
201-708-8233
gzonghetti@kdvlaw.com

I certify that a true copy of the above document was served upon each attorney of record by ECF on January 22, 2014.

/s/ Brian Keane